

BELLSOUTH

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EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th St. SW
Washington, D.C. 20554

Re: CC Docket No. 01-277

Dear Ms. Salas:

The attached information is being filed in the above docket at the request of the Common Carrier Bureau staff. The staff of the Bureau's Competitive Pricing Division requested this information in conjunction with BellSouth's filing of its Georgia-Louisiana 271 application.

This filing is being made pursuant to Section 1.1206 of the Commission's rules. Please include this filing in the record of the above-referenced proceeding.

Sincerely,



Glenn T. Reynolds

Attachments

cc: Deena Shetler
Rich Lerner
Josh Swift
Carol Canteen
Marvin Sacks
Raj Kannan
Jessica Rosenworcel
James Davis-Smith (Department of Justice)

UNE-P USAGE COMPARISON (MONTHLY PER LINE)

Usage Calculations	Georgia	New York	Texas	Oklahoma	Kansas	Massachusetts	Louisiana	Pennsylvania	
% Intraoffice	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	
% Interoffice	0.75	0.75	0.75	0.75	0.75	0.75	0.75	0.75	
% Tandem Occurrence	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	
Local Minutes per month	1200	1200	1200	1200	1200	1200	1200	1200	
Mileage	25	N/A	25	25	25	N/A	25	25	
Number of Calls	225	225	225	225	225	225	225	225	
Non-Local MOU per Month	370	370	370	370	370	370	370	370	
	Georgia	New York	Texas	Oklahoma	Kansas	Massachusetts	Louisiana	Pennsylvania	PA
End Office Switching per MOU	\$0.0016333	\$0.0018370	\$0.0011973	\$0.0022680	\$0.0013100	\$0.0032595	\$0.0018679	\$0.0018020	Originating
EO Interoffice Trunk Port per MOU	\$0.0001564	\$0.0002140	\$0.0000000	\$0.0000000	\$0.0000000	\$0.0005275	\$0.0001800	\$0.0016150	Terminating
Tandem Switching Function per MOU	\$0.0006757	\$0.0007410	\$0.0007940	\$0.0009560	\$0.0007890	\$0.0010205	\$0.0001067	\$0.0007950	
Tandem Interoffice Trunk Port per MOU	\$0.0002126	\$0.0004760	\$0.0003990	\$0.0006070	\$0.0004010	\$0.0016170	\$0.0002220	\$0.0000000	
Common Transport - per Mile per MOU	\$0.0000080	\$0.0000000	\$0.0000011	\$0.0000080	\$0.0000010	\$0.0000000	\$0.0000032	\$0.0000030	
Common Transport - Facilities per MOU	\$0.0004152	\$0.0005480	\$0.0001230	\$0.0002660	\$0.0001570	\$0.0008175	\$0.0003748	\$0.0001440	
Signaling per call			\$0.0000600	\$0.0002670	\$0.0000547	\$0.0000000			
End Office Switching per MOU	\$4.64	\$5.22	\$3.40	\$6.44	\$3.72	\$9.26	\$5.30	\$2.83	
EO Interoffice Trunk Port per MOU	\$0.40	\$0.54	\$0.00	\$0.00	\$0.00	\$1.34	\$0.46	\$2.05	
Tandem Switching Function per MOU	\$0.17	\$0.19	\$0.20	\$0.24	\$0.20	\$0.26	\$0.03	\$0.20	
Tandem Interoffice Trunk Port per MOU	\$0.11	\$0.24	\$0.20	\$0.31	\$0.20	\$0.82	\$0.11	\$0.00	
Common Transport - per Mile per MOU	\$0.25	\$0.00	\$0.03	\$0.25	\$0.03	\$0.00	\$0.10	\$0.10	
Common Transport - Facilities per MOU	\$0.53	\$0.70	\$0.16	\$0.34	\$0.20	\$1.04	\$0.48	\$0.18	
Signaling per call			\$0.01	\$0.05	\$0.01	\$0.00			
Total Switching Cost per Line per Month	\$ 6.10	\$6.89	\$4.01	\$7.63	\$4.36	\$12.72	\$6.48	\$5.36	

NOTES:

- (1) To the extent possible, BellSouth used the FCC's parameters (i.e., percent intraoffice, interoffice, tandem, minutes, calls, etc.). Where BellSouth was not able to determine a specific parameter, it used a reasonable estimate for all states (i.e., 25 miles).
- (2) BellSouth was not able to exactly replicate the total switching rates the FCC earlier calculated for the non-BellSouth states. For comparison purposes, to the extent possible, BellSouth applied the same calculations for each state. However, the New York and Massachusetts rate structure does not appear to include a per mile rate for common transport. Therefore, for those two states, that rate was zeroed out.
- (3) For this analysis, BellSouth assumed that the facility termination includes two terminations. BellSouth was not able to determine if the rates for New York and Texas were based on this same assumption.
- (4) For New York, evening rates were used.
- (5) For Massachusetts, 50% peak and 50% off-peak rates were used.
- (6) For all other non-BellSouth states, the rates used reflect the lowest zone/time of day rate.
- (7) For PA, the End Office Switching rate differs for Originating versus Terminating and there is no Trunk Port rate. The calculation reflects this rate structure.

UNE RATE COMPARISON (\$)

	NY	MA	TX	OK	KS	GA	LA	PA
LOOP (1)						(SL1)	(SL1)	
Z1	11.83	14.11(2)	12.14	12.14	11.86	14.21	12.90	10.25
Z2	12.49	16.12	13.65	13.65	13.64	16.41	23.33	11.00
Z3	19.24	20.04	18.98	26.25	23.34	26.08	48.43	14.00
Z4								16.75
NRC	61.95	26.02	24.75	57.96	42.70	55.69	51.46	38.92 (7)
HCPM (3)	15.77	17.06	18.20	21.99	20.77	20.17	24.03	\$18.90
UNE-P								
Z1	14.33	16.11	14.61	14.32	13.47	12.59	13.13	12.92
Z2	14.99	18.12	16.70	15.86	15.25	14.26	23.75	13.67
Z3	21.74	22.04	23.19	28.83	24.95	21.62	49.62	16.67
Z4								19.42
NRC	3.73	0.19	5.00	3.33	2.35	2.56	3.08	3.35
SWITCHING (E.O. \$/MOU)	0.001837 (4)	0.0032595 (4)	0.0011973 (4)	0.002268 (4)	0.001310 (4)	0.001633 (4)	0.0018679 (4)	0.001802 (4) Orig.
FEATURES	(5)	(6)	In Port	In Port	In Port	In Port	In \$/MOU	(8)

- (1) The recurring costs associated with the cross connects are not included. For GA, this rate is \$.30 per SL1. For LA, this rate is \$.0318 per SL1. Further, there are recurring charges for the non-BellSouth states – NY - \$14.35 per 100 (voice grade); MA - \$.19 per 2W VG; TX - \$1.24 w/testing, \$0 w/o testing; KS - \$1.47 with testing, \$.24 w/o testing; OK - \$2.10 w/testing, \$.45 w/o testing; PA - \$5.22 per 100 circuits.
- (2) MA Loop rates are in 4 zones (metro, urban, suburban, rural). Urban, suburban, and rural were equated to zones 1, 2, and 3. (Metro = \$7.54)
- (3) HCPM average cost per loop from FCC 12/99 data based on total (switched & non-switched) lines.
- (4) See page 6 for details.
- (5) NY charges monthly recurring on some features, e.g., custom ringing - \$.52/mo and 3-way calling - \$.16/mo.
- (6) MA charges for features on an individual basis. If all the listed features (excluding Centrex intercom) are summed, the total is \$8.02 per month, per line.
- (7) Disconnect for GA (10/01) - \$2.77 for SL1 loop and \$6.91 for service order. Disconnect for PA - \$1.34 per loop.
- (8) PA – reflects port rate of \$2.67, which includes all vertical features. Option of buying a port for \$1.90 that excludes certain features that can be purchased separately is also available in PA.

NONRECURRING RATE CONSTRUCTION (\$)

	NY	MA	TX	OK	KS	GA	LA	PA (3)
UNBUNDLED LOOPS								
UNBUNDLED LOOP			15.03	24.38	23.06	42.54	36.54	
LOOP CROSS-CONNECT	14.99 (\$1,499.35 per 100)		4.72	30.25	17.29	12.60	11.94	\$8.80 (\$879.58 per 100)
SERVICE ORDER CHARGE	(1)	(1)	5.00	3.33	2.35	0.55	2.98	4.41 (1)
SERVICE CONNECTION- C.O. WIRING	4.39	1.90						
SERVICE CONNECTION- OTHER	10.17	13.36						
DISPATCH (2)	32.40	10.76						25.71
TOTAL	61.95	26.02	24.75	57.96	42.70	55.69	51.46	38.92

- (1) If more than one loop is included on the order, a service order charge applies – NY 10+ links - \$8.70; MA – 2-9 links - \$10.17 per order, 10+ - \$14.18. PA - \$1.06 for service order processing + \$3.35 for order transaction = \$4.41.
- (2) Assumes 38% dispatch (BellSouth average) x rate per occurrence – NY - \$85.25*38%=\$32.40; MA - \$28.31*38%=\$10.76; PA = \$67.66*38%=\$25.71.
- (3) PA NRC connect only. Disconnect for PA - \$1.34.

NONRECURRING RATE CONSTRUCTION (\$)

	NY	MA	TX	OK	KS	GA	LA	PA (2)
UNE-P								
UNE-P	3.73	0.19	0	0	0	2.01	0.10	0
SERVICE ORDER CHARGE	(1)	(1)	5.00	3.33	2.35	0.55	2.98	3.35
TOTAL	3.73	0.19	5.00	3.33	2.35	2.56	3.08	3.35

(1) If more than one loop is included on the order, a service order charge applies – NY 2-9 links - \$7.50 per order, 10+ links - \$8.70; MA – 2-9 links - \$14.18 per order, 10+ - \$14.18.

(2) PA NRC connect, only. Disconnect for PA - \$1.34.

NONRECURRING RATE CONSTRUCTION (\$)

	NY	MA	TX	OK	KS	GA	LA	PA
DSL LOOPS								
UNBUNDLED LOOP			15.03	24.38	23.06	44.69 (1)	35.27	
LOOP CROSS-CONNECT	14.99 (\$1,499.35 per 100)		4.72	30.25	17.29	12.60	11.94	\$8.80 (\$879.58 per 100)
SERVICE ORDER CHARGE	12.82	6.08	5.00	3.33	2.35	0.55 (3)	2.98	4.41 (3)
SERVICE CONNECTION-C.O. WIRING	4.39	14.55						
SERVICE CONNECTION-OTHER	10.17	13.36						
DISPATCH (2)	32.40	10.76						25.71
TOTAL	74.77	44.75	24.75	57.96	42.70	57.84	50.19	38.92

(1) GA & PA NRC for connect only. Disconnect NRC, when applicable, GA - \$25.65 for UCL-ND loop. Disconnect for PA - \$1.34.

(2) Assumes 38% dispatch (BellSouth average) x rate per occurrence – NY - \$85.25*38%=\$32.40; MA - \$28.31*38%=\$10.76; PA - \$67.66*38%=\$25.71.

(4) The GA rate is \$550 per first 1,000 orders and \$110 for the next 1,000 per month. PA - \$1.06 for service order processing + \$3.35 for order transaction = \$4.41.

UNE RATE COMPARISON (\$)

	NY	MA	TX	OK	KS	GA	LA	PA
DSL LOOP						(UCL-ND)	(UCL-ND)	(ADSL)
Z1	11.83	14.11	12.14	12.14	11.86	11.02	11.77	10.25
Z2	12.49	16.12	13.65	13.65	13.64	12.72	22.39	11.00
Z3	19.24	20.04	18.98	26.25	23.34	20.22	48.26	14.00
Z4								17.50
NRC	74.77	44.75	24.75	57.96	42.70	57.84 (1)	50.19	38.92 (1)
CONDITIONING	0	0	0 (2)	0 (2)	0 (2)	0	0 (3)	0 (4)
COLLOCATION								
CAGELESS (5)	872	488	287	702	413	612	560	527
NRC	8,526	12,619	8,180	11,729	8,183	5,268	2,558	22,091
CAGED (5)	2,020	1,142	848	1,655	1,073	1,694	1,539	782
NRC	8,526	13,864	10,207	16,738	12,512	5,268	2,558	41,063
HOT CUT								
ORDER COORD	10.17	0	0	0	0	16.11/loop	7.92/loop	3.28/order
TIME SPECIFIC	19.58	0	21.44/ 15 MIN	37.11/ 30 MIN	46.76/ 30 MIN	35.74/ LSR	17.56/LSR	10.54/ 15 MIN

- (1) GA & PA NRC for connect only. Disconnect NRC, when applicable, GA - \$25.65 for UCL-ND loop, PA -\$1.34 .
- (2) Interim Rate, subject to true up. Note - an OK July order approved rate of \$822.06 to remove load coils on one short loop, plus \$19.37 for an additional loop in the same cable. For long loops, an additional charge of \$286.15 applies (initial); \$6.57 add'l.
- (3) LA – Bridged Tap Removal = \$ 12.15 per Bridged Tap removed.
- (4) Even though there apparently is no charge for short loops in PA – for loops 18,000 – 30, 000 feet @ 21k ft = \$880.92, 27k ft = \$1,171.62. For Bridged Tap Removal - \$192.52 for single BT, \$468.44 for multiple. Also, Line and Station Transfer - \$140.52
- (5) Based on typical collocation arrangement.